

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**Hammond Development International,  
Inc.,**

*Plaintiff,*

**V.**

**Amazon.com, Inc.,  
Amazon.com LLC,  
Amazon.com Services, Inc., and  
Amazon Web Services, Inc.,**

***Defendants.***



**Civil Action No. 6:19-CV-00355-ADA**

## Jury Trial Demanded

## LEAD CASE


**Hammond Development International,  
Inc.,**

*Plaintiff,*

**V.**

**Google LLC,**

***Defendant.***



**Civil Action No. 6:19-CV-00356-ADA**

## Jury Trial Demanded

## PLAINTIFF'S IDENTIFICATION OF CLAIM TERMS FOR CONSTRUCTION

Pursuant to the Scheduling Order in this case (Dkt. No. 48), Plaintiff Hammond Development International, Inc. (“HDI”) makes this Identification of Proposed Terms and Claim Elements for Construction. HDI proposes the following terms for construction:

**“packetized voice data”**

’032 Patent Claims 1, 2, 7, 8, 9, 12

’816 Patent Claims 1, 6, 15, 20, 29

**“audio data”**

’032 Patent Claims 7, 12, 16

’816 Patent Claims 6, 18, 29

**“preliminary communication session”**

’011 Patent Claim 16

**“request for [a] processing service”**

’483 Patent Claims 10, 17, 22

’011 Patent Claims 11, 23

’040 Patent Claim 3 (via 1)

’937 Patent Claims 3 (via 1), 10 (via 1, 8)

’732 Patent Claims 4, 5 (both via 1)

’935 Patent Claims 8 (via 1, 7), 10 (via 1, 7, 9)

’032 Patent Claims 1, 9, 11, 16

’816 Patent Claims 1, 14, 18, 28

**“processing service(s)”**

’483 Patent Claims 10, 12, 17, 22, 24

’011 Patent Claims 11, 23

’040 Patent Claim 3 (via 1)

’937 Patent Claims 3 (via 1), 10 (via 1, 8)

’732 Patent Claims 4, 5 (both via 1)

’935 Patent Claims 8 (via 1, 7), 10 (via 1, 7, 9)

’032 Patent Claims 1, 9, 11, 16

’816 Patent Claims 1, 14, 18, 28

**“voice representation”**

’032 Patent Claims 1, 9

’816 Patent Claims 1, 27

HDI submits that no other term, phrase, or clause of the asserted claims needs to be construed by the Court. Further, no claim elements are governed by 35 U.S.C. § 112(6). HDI reserves the right to propose constructions for any terms identified by Defendants in this action and/or identified by the Court as needing construction.

Dated: January 31, 2020

Respectfully submitted,



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**ANDREW J. WRIGHT**

**ERIC M. ALBRITTON**  
STATE BAR NO. 00790215

**BRENT N. BUMGARDNER**  
STATE BAR NO. 00795272

**ANDREW J. WRIGHT**  
STATE BAR NO. 24063927

**NELSON BUMGARDNER ALBRITTON PC**  
3131 West 7th Street, Suite 300  
Fort Worth, Texas 76107  
817.377.9111 (telephone)  
903.758.7397 (facsimile)  
ema@nbafirm.com  
brent@nbafirm.com  
andrew@nbafirm.com

**JOSEPH P. OLDAKER**  
ILLINOIS BAR NO. 6295319  
**NELSON BUMGARDNER ALBRITTON PC**  
15020 S. Ravinia Avenue, Suite 29  
Orland Park, Illinois 60462  
708.675.1583 (telephone)  
joseph@nbafirm.com

**COUNSEL FOR PLAINTIFF  
HAMMOND DEVELOPMENT  
INTERNATIONAL, INC.**

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5(b)(1), I hereby certify that the foregoing document was electronically filed with the Clerk of Court using the CM/ECF filing system, which will generate and send an e-mail notification of said filing to all counsel of record, on this the 31st day of January, 2020.

A handwritten signature in black ink, appearing to read "Andrew J. Wright", with a large, stylized flourish at the end.

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ANDREW J. WRIGHT